

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**CHRISTOPHER MCCLAIN,
Individually and on Behalf of Others
Similarly Situated,**

Plaintiff

v.

**MANU-FORCE CORP. (Formerly
Manu-Force, LLC), JENNIFER J.
KEARNEY, and JOHN DANIEL
KEARNEY, JR.,**

Defendants

Civil Action No. 3:24-cv-3001

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO ANSWER
PLAINTIFF'S ORIGINAL COLLECTIVE ACTION COMPLAINT**

Defendants Manu-Force Corp. (formerly Manu-Force, LLC), Jennifer J. Kearney, and John Daniel Kearney, Jr. (collectively, “Defendants”), file this Unopposed Motion to Extend Time to Answer Plaintiff’s Original Collective Action Complaint, and respectfully show the following:

1. Plaintiff filed his Original Collective Action Complaint on December 2, 2024. [Dkt. 1].
 2. Defendants were served on December 17, 2024. Therefore, Defendants' deadline to answer or otherwise respond to Plaintiff's Original Collective Action Complaint is January 7, 2025.
 3. Defendants recently retained Wood Edwards, LLP for representation as defense counsel in this matter.
 4. Defendants request an extension of the deadline to file an answer in light of their recent representation by counsel, and the recent holidays. Defendants respectfully request that the

Court extend the deadline to answer or otherwise respond to Plaintiff's Original Collective Action Complaint by ten days until January 17, 2025.

5. Defense counsel conferred with Plaintiff's counsel regarding the requested ten-day extension and Plaintiff does not oppose Defendants' request.
6. The requested extension will not unduly delay these proceedings or cause any of the Parties undue hardship.

WHEREFORE, Defendants respectfully request that the Court grant their motion and extend the time for Defendants to answer or otherwise respond to Plaintiff's Original Collective Action Complaint by ten days to January 17, 2025.

Respectfully submitted,

/s/ William Hammel
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Counsel for Defendants

CERTIFICATE OF CONFERENCE

I certify that the undersigned counsel conferred with counsel for Plaintiff on January 2, 2025, regarding the basis of this Motion and that Plaintiff is unopposed to the relief requested herein.

/s/ William Hammel
William Hammel

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of January 2025, this document was served on the following counsel for Plaintiff via ECF.

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Counsel for Plaintiff

/s/ William Hammel
William E. Hammel